

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

RICHARD FARMER,

Plaintiff,

-against-

DR. LUCIA PATINO, OPTOMETRIST, P.C., d/b/a PATINO EYE CARE, DR. LUCIA PATINO OD, OWNER RODRIGO MOLINA, OWNER, G.M., and DR. ANGELA V. DUSSAN, OD, et al.,

Defendant(s).

X

ANSWER

Civil Action No.:  
1:18-cv-01435-AMD-LB



Defendant, Angela V. Dussan, O.D., appearing *pro se*, hereby answers the complaint of the plaintiff as follows:

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs "1", "2", "3", "4", "5", "6", "7", "8", "9", "10", "11", "12", "13", "14", "15", "16", "18", "19", "20", "21", "23", "24", "25", "26", "27", "28", "29", "30", "31", "32", "33", "34", "35", "36", "37", "38", "39", "40", "41", "42", "43", "44", "45", "47", "51", "52", "55", "56", "57", "58", "59", "60", "61", "62", "65", "67", "79", "86", "89", "91", "95", "98".
2. Denies each and every allegation contained in paragraphs "17", "46", "49", "50", "53", "54", "63", "64", "66", "68", "69", "70", "71", "72", "73", "74", "75", "76", "77", "78", "80", "81", "82", "83", "84", "85", "87", "88", "90", "92", "93", "94", "96", "97", "99", "100", "101", "102", "103", "104", "105", "106", "107", "108", "109", "110", "111", "112", "113", "114" insofar as they pertain to me.
3. Denies each and every allegation contained in paragraph "22", except admit that I worked with plaintiff for a brief period of time in February, 2016 at Woodside Optical Corp. The allegation that I was terminated for insubordination is false. I terminated my employment at Woodside Optical because Plaintiff acted inappropriately at work place, humiliated me in front of the patients and other employees and discriminated against me because I am a Latino woman and I have an accent when I speak. Further, I did not know the Plaintiff

worked at Patino Eye Care, I learned of him being employed at Patino Eye Care only after his employment was terminated.

4. Denies each and every allegation contained in paragraph "48", except admit that I did agree to be a witness in a related litigation commenced by plaintiff against his former employer, Woodside Optical Corp. I agreed, if need be and if I was available, to be a witness and testify as to the reason I stopped working at Woodside Optical Corp.
5. I disagree with the above because I have no relationship with the plaintiff. I do not work and I am not employed by Dr. Lucia Patino, Patino Eye Care or Rodrigo Molina.
6. I have never employed the plaintiff.
7. With respect to Plaintiff's allegations in Paragraph "71" through "101" because I did not employ the Plaintiff and I do not have any business affiliation with Patino Eye Care. I do not hold any ownership nor managerial nor any work related duties in Patino Eye Care. I am an individual and I do not own a business as alleged by the Plaintiff. Further I disagree with Plaintiff being awarded any attorney's fee because Plaintiff started this lawsuit without an attorney.

#### COUNTERCLAIM

8. This complaint against me, Angela V. Dusan, is retaliatory in nature.
9. The Plaintiff started this lawsuit against me, Angela V. Dussan, as he is alleging is Paragraph 50, because I am a potential witness in a different lawsuit.
10. That while employed in Woodside Optical Corp. Plaintiff discriminated against me based on race, color, ethnicity and humiliated me in front of the patients and the staff resulting in my unwillingness to return to work place and subsequent resignation.
11. The allegations in this complaint against Angela V. Dussan are without merit, factually unsupported, and baseless.
12. As such I am requesting that the Complaint against Angela V. Dussan be dismissed.

Signed this 19 day of June 2018.

Signature of Defendant: Angela V. Dussan  
Name: Angela V. Dussan  
Address: 126 King Street, Malverne, NY 11565  
Telephone Number: 617-981-9432

\*\*I have mailed courtesy copy to Mr. Richard Farmer at the address he provided in Summons.  
Richard Farmer 498 Atlantic Ave, Brooklyn, NY 11217

**FROM:**

Angela V Ossan/  
97-21 Queens Blvd  
REGO PARK NY 11374

**TO:**

UNITED STATES D  
EASTERN DISTRICT  
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